

**RADIO READY TO GROW
(RRTG)**

Frank Hansche

Chairman

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Secretary
Federal Communications Commission
Washington, DC 20554

Re: Action To Supplement Action In Docket RM-11287 (Low Power AM)

Dear Commissioners and Commission Staff,

My name is Frank Hansche. I am General Manager of EAST HILL RADIO: a Part 15 AM station in the Seattle suburb of Kent, Washington.

I am also President of the recently formed advocacy group, RADIO READY TO GROW (RRTG). Our group, which was founded on November 15, 2005, speaks for current and former Part 15 broadcasters who seek to gain a license in a new Low Power AM (LPAM) Radio Service.

As you know: On April 28, 2006, all 12 of the nationally active LPAM advocates, including RRTG, joined 8 other LPAM supporters to submit, in FCC Docket RM-11287, a new "consensus" proposal for structuring a new LPAM Service. Through the tandem filing of a Motion To Accept Late-Filed Reply Comments and the Joint Supplemental Reply Comments themselves, these 20 parties asked the Commission to replace the proposal in the original RM-11287 Petition with a newer, simpler proposal that reflects absolute unanimity throughout the nationwide LPAM community.

While RRTG vigorously supports the new LPAM proposal, we also urge the FCC to address the need for separate Commission action on a separate Petition For Rulemaking. This separate Petition was submitted to the FCC on November 17, 2005, by RRTG and 10 other parties, including all 5 of the RM-11287 Petitioners. A copy of our Petition was placed in RM-11287.

Our Petition urges the FCC to boost Part 15 AM power ceilings to 1 watt. RRTG, and the other 10 Petitioners, suggest adoption of this language:

“Effectively immediately, all legal unlicensed broadcasters on the AM Band, operating under Part 15, may increase their power levels to a maximum level of 1 watt.”

RADIO READY TO GROW views adoption of our separate Part 15 proposal as a vital supplement to the initiation of LPAM in RM-11287. We call this supplement vital because even 10-watt LPAM stations are not likely to find a frequency in every corner of the urban frontier. However, 1-watt Part 15 stations can do so.

We stress that action to authorize and implement LPAM, on the separate “track” of RM-11287, remains our primary goal. Such action will surely bring to many urban areas, and to other locations where the crowded FM Band cannot accommodate 100-watt LPFM stations, the benefits of community-sized, community-focused Low Power Radio. The nation’s most vigorous LPAM advocates have just further smoothed the path for urban Low Power Radio -- by agreeing to support uniformly low power ceilings, set at the Travelers’ Information Service (TIS) level of 10 watts.

On yet another front, the Commission can further ease the barriers to urban Low Power Radio by initiating long-promised “filing windows” for LPFM stations in the 10-watt range. Unlike LPAM, such action requires no Notice of Inquiry or proposed rule. The issuance of LP10 FM licenses is something the Commission has already decided it should do, following intensive deliberations and full opportunity for public comment. All that is needed now is the will to proceed on the path the FCC has already chosen.

For these reasons, we again urge the FCC to establish LPAM, acting through RM-11287. We further urge the FCC to open filing windows for 10-watt LPFM stations. Even when these two steps have been taken, however, we will still need 1-watt Part 15 AM stations as the final piece to the puzzle of bringing community-focused radio back to large urban areas. To this end, the FCC should open a new Docket, besides RM-11287, to consider the November 17, 2005 Petition for 1-watt Part 15 stations.

Sincerely,

Frank Hasche